Submit an Outside Interest Disclosure in M-Inform

Faculty and staff are required to disclose their outside interests annually in-M-Inform per U-M, unit, and Public Health Service (PHS) financial conflict of interest (FCOI) regulations.

Disclosing may include reporting that you don’t have any outside interests related to your U-M responsibilities.

Disclosure Process - Overview

Three types of Disclosure Records are used in M-Inform to report your outside interests for unit and university review:

- Annual Disclosure
- Update Disclosure
- Research-initiated Disclosure

If you’re required to disclose:

Beginning each July 1, you receive an email reminder to complete your annual disclosure. This means:

- Reviewing the training page in M-Inform. Only you, as the discloser, can certify to completing the training.
- Reviewing and updating any previously reported outside interests
- Disclosing any new outside interests

After your annual disclosure has been reviewed by your unit and/or a COI Office:

- You complete an update disclosure to add a new outside interest or change an existing one. You must disclose changes to your outside interests within 30 days if you have a research project funded by an agency following the PHS FCOI regulation.
- If you are requested to disclose (but not required to per U-M, unit, or PHS regulation) by your unit or a COI Office, you start with an update disclosure.

During the COI review:

You may be asked to complete a research-initiated disclosure to provide additional information about an outside interest(s) for unit and COI Office review when a new research activity (PAF, HUM, etc.) arises. The outside interest(s) may result in a COI Management Plan.

Disclosure Tasks

This procedure is divided into sections, each describing a task that may be associated with disclosing outside interests in M-Inform. To go to a specific task (e.g., removing an outside interest) click the applicable link.

- Accessing Your Disclosure Record
- Complete an Outside Interest Disclosure
  - Remove a Previously Reported Outside Interest
  - Edit an Existing Outside Interest
  - Modify a Reviewed Disclosure
  - Add a New Outside Interest
  - Restore an Inactive Disclosure
  - Sign and Submit Your Disclosure Record
    - If a Department Assistant Enters Your Disclosures
Accessing Your Disclosure Record

If you are required to disclose, you can access your annual disclosure in one of two ways:

- By clicking the link in the email reminder to go directly into the disclosure record upon logging in. Or,
- By first accessing M-Inform, logging in, and opening the disclosure record from the Home Workspace.

After submitting your annual disclosure, you must access M-Inform to make changes. If you are requested to disclose, you must access M-Inform to submit an update disclosure.

Complete an Outside Interest Disclosure

This procedure shows accessing the disclosure record from the Home Workspace using an annual disclosure as the example. If you access your annual disclosure via the link in the email reminder, skip to step 3.

Discloser Home Workspace

1. Select Discloser from My Roles, or verify it is selected (not shown).
2. Click the Click here to… button to open your disclosure record.

The button label will change per the disclosure status (e.g., Due Now [applies to the annual disclosure only], Under Review, Requested Changes). The most common button labels are:

- Click here to Disclose
- Click here to Complete
- Click here to Update
- Click here to Make Changes

Disclosure Form – Introduction

3. Read the instructions and click Continue.

If you are working on an update disclosure, go to step 6.
4. After reviewing all training materials and policies, click the checkbox indicating you’ve done so.

5. Click **Continue**.

6. Click the appropriate checkbox(es) to indicate if you have outside interests, activities, or relationships that are related to your U-M responsibilities.

7. Click the appropriate radio button to indicate if you have a spouse, domestic partner, or dependent(s) who is currently a U-M employee.

   **Note:** If your answer is “Yes,” enter his/her name in the field that displays (not shown).

8. Click **Continue**.

Any disclosures from the previous year display in the **Disclosures Pending Review** list.

The next steps in the process will vary depending on whether you:

- Selected “None…” in step 6, or have no changes/additions (go to [Sign & Submit Your Disclosure Record](#)).
- Selected a related outside interest in step 6 (go to [Edit](#) or [Add](#), as applicable).
- Need to remove a previously reported outside interest (go to step 9).
Remove a Previously Reported Outside Interest

Remove outside interests that are no longer active (i.e., the End Date is past), (e.g., the consultation has ended, etc.). Upon unit or COI Office review, the outside interest information becomes available on the Inactive tab on your Home Workspace for reference.

Disclosure Form – Disclosure Details Page

9. Click **Remove** for the outside interest disclosure you wish to delete.

10. Click **Yes** to deactivate the disclosure.

11. Enter a brief description of why the disclosure is inactive (e.g., relationship no longer applies).

12. Click **OK** to return to the Disclosure Details page.

Notes:

- The disclosure displays with a status of “Pending Removal” until unit review is complete.
- The **Edit** button changes to **Re-Open**, which can be used to reactivate the disclosure if it has a status of “Pending Removal”.

![Disclosure Form Screenshot]

[Image: Disclosure Form Screenshot]
Edit an Existing Outside Interest

Both the Home Workspace and the Disclosure Details page list outside interests that you have previously reported. When completing an annual disclosure, these outside interests move to a “pending review” status. Upon your review of the details (i.e., Relationship, [Estimated] Days, Total Value, etc.), edit the disclosure if necessary. You may also edit a disclosure to report:

- Travel (if required per unit rules or PHS regulations)
- Related research (i.e., how a PAF or HUM is associated with the outside interest)

Disclosure Form – Disclosure Details Page

13. Click Edit to open the outside interest disclosure you wish to update.

Disclosure Form – Estimated Days of Engagement

15. Verify the Estimated Days you will spend engaged in this interest for the current fiscal year is correct, or change the value if needed.

Note: This field defaults to the value reported for the previous fiscal year.
Disclosers
Submit an Outside Interest Disclosure
Step-By-Step Procedure

Disclosure Form – Travel

16. Read the guidelines for reporting travel.
17. If travel applies to your outside interest and you meet one of the guidelines (e.g., PHS), either:
   - Click Add (top button) to manually enter travel information
   - OR
   - Click Add (bottom button) to upload a file (e.g., spreadsheet, unit form) with travel information.

Travel – Submit a Document Window

18. Click Browse to search for and select the file you wish to upload.

Note: Depending on the type of web browser you use (e.g., Internet Explorer, Chrome), the names of the Browse button may vary. The button functions the same way regardless of name.

19. Click OK.
The uploaded file appears and is available for revision or deletion, as appropriate.

Disclosure Form – Related Research

20. Click Yes if the outside interest relates to your research activity.
21. Click Continue to go to the Related Research Projects page.
Disclosure Form - Related Research Projects Page

22. Click **Update** to associate the outside interest with a project.

**Note:** Don’t see your project in the list? Click **Add** to enter it.

23. Click the checkbox(es) to indicate how the outside interest is related to the project.

24. Click **OK**.

**Note:** To remove an association with a project, click Update, uncheck the checkbox, and then click OK.

25. Click **Finish** to return to the Disclosure Details page.

26. Repeat steps 13 - 25 for each outside interest.

If your edits/additions are complete go to **Sign & Submit Your Disclosure Record**

Modify a Reviewed Disclosure

Once reviewed, your outside interest disclosures display in the **Reviewed Disclosures** list on the Disclosure Details page and in the **Current** list on the Home Workspace. When completing an **update disclosure**, you must first move an outside interest disclosure to a “pending review” status in order to edit it.

Disclosure Form – Disclosure Details Page

1. From the Reviewed Disclosures list, click the **Modify** button next to the disclosure you wish to edit.

2. Click **OK**.

**Notes:**

- The disclosure moves to the Disclosures Pending Review list and can be edited as needed. See the **Edit** section for detailed steps.
- Remember that you must **Sign and Submit** the update disclosure once edits are complete.
Add a New Outside Interest Disclosure

Disclosure Form – Disclosure Details Page

1. Click Add Disclosure.

2. Enter the name of the organization in the “Select” field.

   **Note:** As you type, M-Inform automatically displays a list of matching values. Click the applicable value from the list.

   - If you can’t select the organization from the list, enter the name in the “If you are unable…” field.

3. Click OK.

Disclosure Form - Questions

4. Answer each question, as applicable, for the outside interest. (See the **Edit** section for details regarding particular questions.)

   **Note:** Click **Continue** to move through the form.

5. Click **Finish** on the last question to return to the Disclosure Details page (not shown).

6. Repeat steps 1-5 to report additional outside interests, if applicable.

If your additions/changes are complete go to **Sign & Submit Your Disclosure Record**.
Restore an Inactive Disclosure

Once reviewed, disclosures with a "pending removal" status become inactive and display in the Inactive Disclosure list on the Disclosure Details page. If your activity with that entity resumes, you can restore the inactive disclosure to edit it as applicable instead of adding it as a new outside interest.

Disclosure Form – Disclosure Details Page

1. Click Restore [Restore] next to the inactive disclosure you wish to restore.
2. Click Yes.
3. (Optional) Enter a reason in the field provided.
4. Click OK.

The disclosure is removed from the Inactive Disclosures section and displays under Disclosures Pending Review.

If you need to edit the restored disclosure, go to Edit an Existing Outside Interest.

If your additions/changes are complete go to Sign & Submit Your Disclosure Record.

Sign and Submit Your Disclosure Record

The last step in the process is to sign and submit the disclosure record from the Disclosure Details page. You sign once for all reported and removed outside interests. You must sign and submit, even if you selected "None..." on the Related Outside Interests page or had no edits/additions to make on your annual disclosure.

Only you, as the discloser, can sign/submit your disclosure record.

Disclosure Form – Disclosure Details Page

1. Click Sign and Submit.

Note: The system validates that all required sections have been completed. You must correct any errors before continuing.
Attestation Window

2. Read the **Attestation** then click **OK**.

The **Disclosure Workspace** displays and the disclosure state changes to “Department Review” (not shown).

To return to your Home Workspace click **My Home** in the Shortcuts menu (not shown).

- On your Home Workspace, the disclosure record now has a status of “Under Review” and no longer appears on the Action Required tab.
- The submitted disclosure record now displays on the **In Progress** tab.
- To access your submitted disclosure to make changes, click the **Click here to Update** button.

If a Department Assistant (Proxy) Enters Your Disclosure

If another person (i.e., a Department Assistant) enters your outside interest disclosures, you will receive an email to log in to M-Inform to:

- **Verify** the information is correct
- **Attest** to training (Annual Disclosure only), and
- **Sign and submit** the disclosure record.

Email from Unit Assistant to Discloser

1. Click the link in the email to log into M-Inform.

2. The **Introduction** page of the disclosure form displays (not shown).

3. From the Introduction page, click **Continue** to:

   - View the disclosure and complete required sections
   - **Edit** or **add** information (if applicable)
   - **Remove** outside interests
   - **Sign and submit** the disclosure record

Refer to the procedures above for help.